

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

FILED IN DISTRICT COURT  
OKLAHOMA COUNTY

DEBORAH DAVIS, INDIVIDUALLY AND AS )  
PERSONAL REPRESENTATIVE OF THE )  
ESTATE OF BARBARA MOSLEY, TOMMY )  
DAVIS, GERALD DAVIS, JOEL DAVIS, AND )  
DALE MOSLEY, )

Plaintiffs,

vs.

FEDERAL INSURANCE COMPANY,  
Defendant.

JUN 21 2018

RICK WARREN  
COURT CLERK

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Case No. CJ-2018-3398

PETITION

Plaintiff, for Petition against Defendant, states:

1. Defendant insured Barbara Mosley under life insurance policy #99075510.

Plaintiff Deborah Davis, is one of the named beneficiaries on this accidental death policy and her personal representative. On May 29, 2017, Barbara Mosley died in Oklahoma due to an accident. Plaintiff made claim (claim #3093240) for the \$300,000.00 policy benefit.

Defendants wrongfully denied the claim arguing death was not accidental.

2. The denial was in bad faith, causing emotional and financial distress.

**WHEREFORE**, Plaintiffs pray judgment against Defendant for \$300,000.00 on the contract claim, plus pursuant to 36 O.S. § 3629, interest at 15%, a reasonable attorney fee, costs, and, on the bad faith claim, an amount in excess of the amount required for federal court jurisdiction.



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**ATTORNEY'S LIEN CLAIMED**